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September 19, 2022

Hon. Ellen L. Hollander  
U.S. District Court  
101 W. Lombard Street  
Baltimore, MD 21201

Re: United States v. Keyon Paylor  
Criminal Case No. ELH-14-271

Dear Judge Hollander:

The Court reached out to the parties in this matter about a pending violation of supervised release petition after the Court received a letter from Mr. Paylor asking to resolve the petition, which is serving as a detainer and affecting his security classification in the Maryland Department of Corrections. ECF 166. Undersigned counsel asked the Court to consider recalling the warrant so that the petition would no longer serve as a detainer. ECF No. 174. The Court held a status conference call on June 22, 2022, and Assistant United States Attorney Peter Martinez opposed a recall of the warrant. While the Court declined the request to recall the warrant, the Court indicated a willingness to schedule a violation of supervised release hearing for Mr. Paylor if that is what he desired. Almost three months have passed since that conference call—and the Fourth Circuit Court of Appeals still has not issued a ruling on Mr. Paylor's pending § 2255 petition. At this point, it is Mr. Paylor's desire for the Court to schedule a violation of supervised release hearing. Because Mr. Paylor is in state custody, the Department of Corrections will require at least three weeks of notice to honor a writ. Thus, I am asking the Court to schedule a hearing in the second half of October.

Respectfully,

/s/

Katherine Tang Newberger  
First Assistant Federal Public Defender

cc: Peter Martinez, Assistant United States Attorney (via ECF)  
Bruce James, U.S. Probation Officer (via email)  
Renee Spence, Esq., Loevy & Loevy (via ECF)